

**FILED**

JAN - 5 2016

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA

TERESA L. DEPPNER, CLERK  
U.S. District Court  
Southern District of West Virginia

*Jaquette Damar Flores*

*34834-25*

(Enter above the full name of the plaintiff  
or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

**VERSUS**

CIVIL ACTION NO. *3:16-cv-00065*  
(Number to be assigned by Court)

*Jaylana Jay*

(Enter above the full name of the defendant  
or defendants in this action)

**COMPLAINT**

**I. Previous Lawsuits**

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes \_\_\_\_\_

No ☒ \_\_\_\_\_

- B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs:

Jaquette Damon F. Jones

Defendants:

Taylana R. Jay

2. Court (if federal court, name the district; if state court, name the county);

Cabell County

3. Docket Number: \_\_\_\_\_

4. Name of judge to whom case was assigned:

\_\_\_\_\_

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

\_\_\_\_\_

6. Approximate date of filing lawsuit: \_\_\_\_\_

7. Approximate date of disposition: \_\_\_\_\_

II. Place of Present Confinement:

Western Regional Jail

A. Is there a prisoner grievance procedure in this institution?

Yes ☒ No ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ☐ No ☒

C. If you answer is YES:

1. What steps did you take? \_\_\_\_\_

\_\_\_\_\_

2. What was the result? \_\_\_\_\_

\_\_\_\_\_

D. If your answer is NO, explain why not: Because there is a

III. Parties

buddy buddy system going on here between the  
male and female staff. Do not know who  
never get done about the problem I have with  
the way the nurse created me a pill pass.

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Jacquette Damon Eades

Address: 107 Hoolan Place, Brecksville, OH 44130

B. Additional Plaintiff(s) and Address(es): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: Taylana T. Jay  
 is employed as: Nurse  
 at Western Regional Jail

D. Additional defendants: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

#### IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On 12-20-15 Nurse Taylana T. Jay refused to give me my medication at evening pill pass that is prescribed to me by the court appointed Doctor. I requested my Prolase because I have really bad problems with my stomach and she told me there was none on the pill cart and she wasn't stopping pill pass to go to medical (to just) to get me some Prolase. I asked Officer Taveris who was running pill pass with the nurse would he take me to medical to get my medication once pill pass was over and he told me after she told him no that he wasn't going to take me to medical to get my medication.

## IV. Statement of Claim (continued):

Jaylana is a very disrespectful nurse towards the inmates and I think it because she has relations with some of the high ranking male authorities in the jail that makes her think she can do what ever she wants to do in there jail and to the inmates. She has been very disrespectful towards me on numerous occasions and I'm tired of it and that's why I'm taking action.

## V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I would like for her to be fired and me to get paid for the suffering I had to go through the night she refused to give me my medication. I'm asking \$25,000 for my pain and suffering. I would also like for the courts to bring Officer Jarvis to court as one of my witnesses and several of the ~~nurses~~ nurses because she all so may it clear to them that she refused me my medication because she wasn't going to stop pill pass just to go to medical to get my medication, when she could have had Officer Jarvis to bring me to medical like they always do after pill pass to get my medication or she should have brought it to me like any other good nurse who does her job right would have.

**V. Relief (continued)):**

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**VII. Counsel**

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

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- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes \_\_\_\_\_ No ☒

If so, state the name(s) and address(es) of each lawyer contacted:

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If not, state your reasons: I don't have the  
money to afford an Attorney

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes \_\_\_\_\_ No ☒

If so, state the lawyer's name and address:

\_\_\_\_\_  
\_\_\_\_\_

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12-21-15.  
(Date)

\_\_\_\_\_  
\_\_\_\_\_

Signature of Movant/Plaintiff

\_\_\_\_\_  
Signature of Attorney  
(if any)

101 Jackson  
Barboursville, WV  
25504

6085-01028102

THIS PERSON IS AN INMATE  
OF WESTERN REGIONAL JAIL

Clerk United States District Court  
845 Fifth Avenue, Room 101  
Huntington, West Virginia 25701

